



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

DEC 23 2011

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-084

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Craig Lorch  
Manager  
Total Reclaim, Incorporated  
1915 South Corgiat  
Seattle, Washington 98108

**Re: Letter of Advisement Regarding Disposal of PCB Containing Waste**

Dear Mr. Lorch:

On September 27, 2011, the U.S. Environmental Protection Agency (EPA) conducted an inspection at the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the Federal polychlorinated bi-phenyl (PCB) regulations that have been adopted under the Toxic Substances Control Act (TSCA) (EPA 40 C.F.R. § 761)

After reviewing the inspection report, we understand that Total Reclaim, Inc., transports and receives PCB and Non-PCB light ballasts at the facility. Depending on the client, light ballasts may or may not be marked as containing PCBs. During the time of the inspection, Mrs. Halferty, Environmental Health and Safety Manager for Total Reclaim, Inc., stated to the inspector that PCB items are picked up monthly. The last shipment was on September 9, 2011, and consisted of 23 drums and weighed 6664 kilograms.

Commercial Storage facilities that do not exceed 500 gallons of liquid and /or non- liquid materials containing PCBs at regulated levels are not required to seek EPA approval as a commercial storer. At the time of the inspection Total Reclaim Inc. does or likely will exceed a total of 500 gallons of PCB wastes and thus does not appear to be exempt from the requirements to seek and obtain EPA approval for storage for disposal activities. The EPA understands that you have provided us with the notification only as a transporter of PCB items, and not as a commercial storer of PCBs. Therefore, you are conducting regulated activities both without a required written approval from the EPA and without providing notice to the EPA, which constitutes a violation of 40 C.F.R. § 761.205. This requires all storage, transporters and disposers of PCBs to notify the EPA using form 7710-53 and obtain a commercial storage number.

USEPA REG

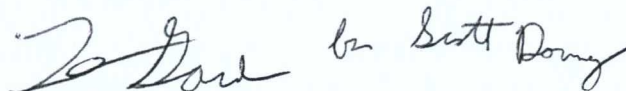


0001011

Information on commercial storage can be found at <http://www.epa.gov/wastes/hazard/tsd/pcbs/>  
If you have any questions, please contact Ms. Michele Wright, Regional PCB Program, at  
(206) 553-1747, or by email at [wright.michele@epa.gov](mailto:wright.michele@epa.gov)

DEC 3 5 2000

Sincerely,

A handwritten signature in cursive script, appearing to read "Scott E. Downey".

Scott E. Downey, Manager  
Pesticides and Toxics Unit

U.S. Postal Service™

# CERTIFIED MAIL™ RECEIPT

*(Domestic Mail Only; No Insurance Coverage Provided)*

For delivery information visit our website at [www.usps.com](http://www.usps.com)®

## OFFICIAL USE

Postage

\$

Certified Fee

Return Receipt Fee  
(Endorsement Required)

Restricted Delivery Fee  
(Endorsement Required)

Postmark  
Here

Total

Craig Lorch  
Manager

Total Reclaim, Incorporated  
1915 South Corgiat  
Seattle, Washington 98108

Sent To

Street, Apt.  
or PO Box

City, State

7011 1150 0000 0577 0545

## Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

### ***Important Reminders:***

- Certified Mail may **ONLY** be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- **NO INSURANCE COVERAGE IS PROVIDED** with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.**

PS Form 3800, August 2006 (*Reverse*) PSN 7530-02-000-9047



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Craig Lorch  
Manager  
Total Reclaim, Incorporated  
1915 South Corgiat  
Seattle, Washington 98108

2. Article Number (Copy from service label)

7011 1150 0000 7954 0045

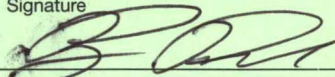
**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

B. Date of Delivery

C. Signature

X



☐ Agent

☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

UNITED STATES POSTAL SERVICE



First Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Michele Wright  
Attn: OCE-084  
U.S. Environmental Protection Agency  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101



Commercial storer information can be found [www.epa.gov/wastes/hazard/tsd/pcbs/helpful information](http://www.epa.gov/wastes/hazard/tsd/pcbs/helpful%20information) can be found at <http://www.epa.gov/wastes/hazard/tsd/pcbs/> If you have any questions, please contact Ms. Michele Wright, Regional PCB Program, at (206) 553-1747, or by email at [wright.michele@epa.gov](mailto:wright.michele@epa.gov)

N:/apps/OCE/Pesticides and Toxics/Michele Wright/Advisement/Total Reclaim 120211

CONCURRENCES			
Initials:	<i>MW</i>	<i>23</i>	<i>JS for Da</i>
Name:	Wright	Gardner	Downey
Date:	<i>12-9-11</i>	<i>12-9-11</i>	<i>12/22/11</i>